



VIA EMAIL

January 31, 2017

Mr. Brian Torrie  
Canadian Nuclear Safety Commission  
280 Slater Street  
P.O. Pox 1046, Station B  
Ottawa, ON K1P 5S9

Dear Mr. Torrie:

**Re: AREVA Comments on CNSC REGDOC 2.1.2 – Safety Culture**

AREVA is committed to fostering a healthy safety culture and has integrated our commitment into the organization's governing documentation. We periodically conduct assessments to better understand our safety culture and to drive continual improvement. Attached are AREVA's comments on draft REGDOC 2.1.2 for your consideration.

Please contact me by phone: 306.343.4058 or email: [dale.huffman@areva.com](mailto:dale.huffman@areva.com) if you have questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Dale Huffman', is written over a light blue horizontal line.

Dale Huffman  
Vice President, Health, Safety Environment and Regulatory Relations

cc: ARC Distribution

## AREVA Comments on CNSC REGDOC 2.1.2 – Safety Culture

1. Preface – The statement “Licensees are expected to review and consider guidance; should they choose not to follow it, they should explain how their chosen alternate approach meets regulatory requirements” places a burdensome obligation on licensees and in so doing, makes the guidance a de facto requirement. The statement should be removed from the document.
2. Scope – Section 1.2 requires rewording to clarify applicability of Section 2 to nuclear power plants.
3. Uranium Mines and Mills – The international standards developed by the IAEA which form the basis of the REGDOC are primarily focused on nuclear power plants (NPP). While safety culture characteristics and evaluation methodologies for uranium mines and mills (UMM) and NPPs may have commonalities, the REGDOC has provided flexibility to UMMs by limiting the scope of UMM requirements to Section 2, and offering the remaining content of the REGDOC as available guidance which may be applied using a graded approach.
4. Security Culture – The CNSC has introduced *Security Culture* into the REGDOC without previous discussion on the topic, i.e. security culture was not presented for discussion in CNSC’s “Discussion Paper DIS-12-07, Safety Culture for Nuclear Licensees” or any other document.
  - a. As this is a newly introduced topic, CNSC should be prepared to adapt REGDOC 2.1.2 based on comments received on nuclear security from stakeholders and provide a revised draft for comment, or remove Nuclear Security Culture entirely from this REGDOC.
  - b. CNSC should clarify that it is referring to *nuclear security* in a manner consistent with IAEA in all cases, i.e. security of radioactive material, to avoid misinterpretation with the common and broader understanding of the term *security*.
  - c. CNSC should clarify that *Nuclear Security Culture* aspects of Section 2 apply to facilities managing nuclear materials identified in Schedule 1, or facilities identified in Schedule 2, of the Nuclear Security Regulations.
  - d. Safety and nuclear security are less similar than indicated by the REGDOC. An organization may have different attitudes, management systems and evaluation methods for the prevention of accidents (safety) and prevention of deliberate malicious acts (security).
5. Stakeholders – Page 5 - “Complete and accurate information is provided to the CNSC in a timely and open manner”. Suggest replacing “CNSC” in this sentence with “stakeholders” as an indicator of a healthy safety culture. CNSC is amongst a set of stakeholders benefiting from information sharing which may include provincial safety regulators, occupational safety committees, industry associations, partners, etc.